

TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL

UNITED STATES

-v.-

JUSTIN DIXON

23-mj-120

Docket Number

SUBMITTED BY: Plaintiff ___ Defendant ___ DOJ ☒

Name: Lorena Michelen

Firm Name: USAO - EDNY

Address: 271-A Cadman Plaza East

Brooklyn, NY 11201

Phone Number: 718-254-6475

E-Mail Address: Lorena.Michelen@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES ___ NO ☒

If yes, state description of document to be entered on docket sheet:

MANDATORY CERTIFICATION OF SERVICE:

A.) ___ A copy of this application either has been or will be promptly served upon all parties to this action, B.) ___ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: ___; or C.) ___ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

February 3, 2023

DATE

SIGNATURE

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: _____

Judge/Magistrate Judge: _____

Date Entered: _____

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

Ongoing criminal investigation _____

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.**

DATED: Brooklyn, NEW YORK
February 3, 2023

U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE February 3, 2023
DATE

LHE:LM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

JUSTIN DIXON,

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

MARGARET MURPHY, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about January 26, 2023, within the Eastern District of New York and elsewhere, the defendant JUSTIN DIXON , together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person in and affecting commerce, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and that the person would be caused to engage in a commercial sex act.

(Title 18, United States Code, Section 1591)

The source of your deponent's information and the grounds for her belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

TO BE FILED UNDER SEAL

COMPLAINT AND AFFIDAVIT IN
SUPPORT OF ARREST WARRANT

(18 U.S.C. § 1591)

No. 23-mj-120

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) since 2016 and am currently assigned to the Child Exploitation and Human Trafficking Task Force, where I investigate sex trafficking and various related crimes. I have been involved in the investigation of numerous cases involving sex trafficking, including those involving trafficking of minors. In that capacity, I have participated in investigations involving the debriefing of sex trafficking victims, review of telephone records and GPS data, review of money transfer records, surveillance, analysis of pen register information, and various other investigatory techniques. Through my training, education and experience, I have become familiar with the manner in which sex trafficking is carried out, and the efforts of persons involved in such activity to avoid detection by law enforcement.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

3. The Penn Track is a small geographical area off of Pennsylvania Avenue in East New York, Brooklyn. It runs from Flatlands Avenue in the south up north to Linden Boulevard, and from Louisiana Avenue in the west to Pennsylvania Avenue in the east. Like other open area environments where prostitution occurs, the Penn Track is commonly referred to as “the track” and “the blade.”

4. Nightly along the Penn Track, individuals who are engaged in sex trafficking and/or involved in promoting prostitution drop off females who work for them in prostitution. Typically, customers along the track drive up to the females and arrange for commercial sex acts with them. Commercial sex acts typically occur in the customers’ vehicles, in public on the street, and in nearby hotels and motels.

5. On or about January 26, 2023, FBI agents received information from NYPD officers regarding a 14-year-old victim (“Jane Doe”), who was allegedly being forced into prostitution, through violence or threats of violence, by the defendant, JUSTIN DIXON, who was operating in Staten Island, New York, and in Brooklyn, New York.

6. On or about January 26, 2023, law enforcement officers from the FBI and the NYPD rescued Jane Doe from a house located in Staten Island, New York (the “Staten Island House”), where JUSTIN DIXON was holding her against her will.² Several other adult females were found in the house, together with DIXON.

7. After interviewing Jane Doe, reviewing documents and evidence, and discussing the matter with other law enforcement officers, I learned that JUSTIN DIXON transported Jane Doe to the Penn Track on various occasions and forced her to engage in sexual acts with unknown individuals in exchange for monetary payments.

8. Specifically, Jane Doe explained during her interview that she had met the defendant on the street a few months ago, and that after exchanging messages on social media, on or about January 22, 2023, the defendant, JUSTIN DIXON, picked up Jane Doe from the place where she was residing and took her to the Staten Island House, where at least two other women were living with DIXON. Almost immediately thereafter, until his arrest on January 26, 2023, DIXON transported Jane Doe on multiple occasions to the Penn Track and forced her to engage in commercial sex acts with unknown individuals in exchange for monetary payments.

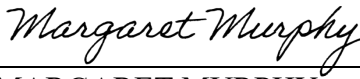
9. Per Jane Doe, on each occasion after forcing Jane Doe to engage in sexual acts with unknown individuals in exchange for monetary payments, which were sometimes made via electronic means, such as via applications like CashApp, JUSTIN DIXON collected the

²

The address of the residence is known to your deponent.

payments and transported Jane Doe back to the Staten Island House.

WHEREFORE, your deponent respectfully requests that the defendant JUSTIN DIXON be dealt with according to law.



MARGARET MURPHY
Special Agent
Federal Bureau of Investigation

Sworn to before me this
3rd day of February, 2023 VIA TELEPHONE



HONORABLE SANKET J. BULSARA
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

JUSTIN DIXON

Case No. 23-mj-120

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) JUSTIN DIXON,
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Title 18, United States Code, Section 1591

Date: 02/03/2023*Issuing officer's signature*City and state: Brooklyn, New YorkSanket J. Bulsara, U.S. Magistrate Judge*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates *(name, relation, address, phone number)*: _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer *(if applicable)*: _____

Date of last contact with pretrial services or probation officer *(if applicable)*: _____